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Before the Federal Communications Commission Washington, D.C. 20554

In re Applications of

LIBERTY PRODUCTIONS,
A LIBERTY PARTNERSHIP

Et. Al.

For Construction Permit for
New FM Channel 243A

MM Docket No. 88-577

File No. BPH-870831MI

PECEIVED

DEC -3 1999

Biltmore Forest, North Carolina

FCC MAIL ROOM

To: The Commission

SUPPLEMENT TO OPPOSITION TO MOTION TO ENLARGE ISSUES

Liberty Productions, a Limited Partnership ("Liberty") by counsel herewith submits as a Supplement to its Opposition to Motion to Enlarge Issues, previously filed in the above referenced proceeding, the attached copy of the Declaration of Valerie Klemmer Watts, which was inadvertently omitted at the time of filing, and requests that the same be accepted.

Liberty's Opposition to the Motion to Enlarge Issued filed by Orion Communications Limited made reference to the Declaration, as being attached. $\frac{1}{}$ The sole purpose of this Supplement is to supply a copy of the inadvertently omitted Declaration.

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^{1.} The original of the Declaration is being submitted for association with Liberty's Opposition to the Motion to Enlarge Issues filed by Biltmore Forest FM, Inc.

WHEREFORE, premises considered the attached Declaration should be accepted as and considered with Liberty's Opposition to Motion to Enlarge Issues, previously filed in this proceeding.

Respectfully Submitted

LIBERTY PRODUCTIONS,
A LIBERTY PARTNERSHIP

Bv:

Fimothy K. Brady Its Attorney

P.O. Box 71309 Newnan, GA 30271-1309

December 3, 1999

DECLARATION

- I, Valerie Klemmer Watts, hereby depose and state that:
- 1. I am the sole general partner of Liberty Productions, a Limited Partnership ("Liberty").
 - 2. None of the members of my immediate family currently have or have had at any time since the filing of Liberty's application any interest, direct or indirect, in any medium of mass communications.
 - 3. Prior to the submission by Liberty of its short form application (FCC Form 175), I determined the amount of the total equity investment made by its sole limited partner, David Murray, as well as the approximate amount of Liberty's total asset value, as defined as the total equity investments of both its general and limited partners plus its debt
- 4. Based on these calculations I concluded that David Murray's equity investment, which did not exceed \$ 36,000, represented substantially less than 33% of Liberty's total asset value, as defined by its equity plus its debt, which exceeded \$120,000

David Murray is not a creditor of Liberty.

5. As of August 20, 1999, Liberty had no agreement or understanding, whatsoever, with Cumulus Broadcasting, Inc.

I hereby certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signed and dated this 24th day of November 1999.

Valerie Klemmer Watts

CERTIFICATE OF SERVICE

I, Timothy K. Brady, hereby certify that I have this day of December, 1999, served a copy of the foregoing Supplement to Opposition to Motion to Enlarge Issues by First Class mail, postage prepaid upon the following:

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FCC
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Timothy K. Brady